

**CERTIFICATE FOR AN ACTION IN MEDICAL MALPRACTICE
PURSUANT TO 735 ILCS 5/2-622**

I am a physician licensed in the State of New York to practice medicine in all of its branches. I am board certified in obstetrics. I have been in active practice for over thirty years. I am qualified and familiar with the appropriate standard of care for the issues in this case, and I am familiar with the methods, procedures and treatments relevant to the allegations at issue in this case.

I have reviewed in detail the records, facts, and other relevant materials pertaining to the medical care and treatment provided to Maria Munoz and Fatima Alqadi, including medical records from Aunt Martha's and Franciscan St. James Hospital.

For the reasons that follow below, it is my opinion, which I hold to a reasonable degree of medical certainty, that a meritorious basis for filing an action exists against Richard L. Jones, M.D., Anthony Millard, M.D., and John Wodynski, P.A.

Richard L. Jones, M.D., deviated from the standard of care as follows:

- failed to diagnose Maria Munoz with cholestasis of pregnancy;
- failed to order bile salts; and
- failed to ensure that Maria Munoz delivered Fatima Alqadi at 37 weeks gestation.

Anthony Millard, M.D., deviated from the standard of care as follows:

- improperly diagnosed Maria Munoz with an allergic reaction to laundry detergent;
- failed to diagnose Maria Munoz with cholestasis of pregnancy;
- failed to order bile salts; and
- failed to ensure that Maria Munoz delivered Fatima Alqadi at 37 weeks gestation.

John Wodynski, P.A., deviated from the standard of care as follows:

- improperly diagnosed Maria Munoz with an allergic reaction to laundry detergent;
- failed to diagnose Maria Munoz with cholestasis of pregnancy;
- failed to order bile salts; and
- failed to ensure that Maria Munoz delivered Fatima Alqadi at 37 weeks gestation.

It is my opinion, which I hold to a reasonable degree of medical certainty, that the above-referenced deviations caused, or contributed to cause, the stillbirth of Fatima Alqadi.

